

# PRIVACY POLICY

Effective Date: April 5, 2020

Urban Pantry knows that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This privacy policy lets you know what information we collect, how we may share that information, and your choices regarding the sharing of your information.

## Privacy Policy Contents

- Our Privacy Commitment to Our Customers
- Acceptance of and Changes to this Privacy Statement
- Information Collection and Use
- Cookies & Clickstream Technology
- Updating Your Personal Information
- Account Registration
- Security of Your Personal Information
- Disclosure of Personal Information
- Information from Third Parties
- Children's and Minor's Privacy

### OUR PRIVACY COMMITMENT TO OUR CUSTOMERS

Urban Pantry values the relationship we have with our customers and are committed to responsible information-handling practices. We take great care in safeguarding your personal information and in complying with all applicable federal and state privacy laws and our own internal standards and best practices.

We follow these privacy principles both online and offline in the collection, use, security and sharing of customer information:

- **NOTICE.** We will provide you notice of our data collection, use, and disclosure practices.
- **CHOICE.** When we contact you for marketing purposes, we will let you know how to remove your name from future marketing efforts.
- **SECURITY.** We will use reasonable security measures to protect the personal information we receive from you.

### ACCEPTANCE OF AND CHANGES TO THIS PRIVACY STATEMENT

As Urban Pantry continues to improve the services, products and the features we provide, this policy is subject to change. We may amend this policy at any time by posting the amended policy on our Site.

By using the Urban Pantry Site and services, you signify your acceptance of this Privacy Statement. If you do not agree or are not comfortable with any policy described in this Privacy Statement, your only remedy is to discontinue use of the Urban Pantry Site. We reserve the right to modify this Privacy Statement at any time. Your continued use of any portion of the Urban Pantry Site following notification or posting of such changes, will constitute your acceptance of those changes.

### INFORMATION COLLECTION AND USE

Urban Pantry is the sole owner of the information collected on this Site. We collect, use and disclose your Personal Information (including individuals associated with you, all of whom are referred to as “you” in this Privacy Policy) in its normal course of business for the following purposes:

- Providing you with products and services offered on our Site which you are interested in;
- To determine your location so we know the closest store to you is;
- Establishing and maintaining communications with you;
- Where you have requested information from us or one of our partners, assisting in the response to your request for information;
- Responding to your inquiries about purchases, accounts and other services;
- Marketing our, and our affiliates and partners, goods and services to you;
- Processing transactions through service providers;
- Meeting legal, security, processing and regulatory requirements;
- Protecting against fraud, suspicious or other illegal activities; and
- Compiling statistics for analysis of our Sites and our business.

We will not sell, share or rent this information to others in any way that varies from what is disclosed in this statement. Urban Pantry collects information from our users at several different areas on our Site. You may receive information regarding new features, services and special offers we think you’ll find valuable. **You may also access the personal information you have submitted to Urban Pantry by selecting “My Account” and editing the information as it exists in our system currently. You are also able to access your information to update or delete it by contacting us.**

## **COOKIES & CLICKSTREAM TECHNOLOGY**

As you navigate the Site, we may also collect information using commonly-used information-gathering tools, such as cookies and web beacons (collectively “Website Navigational Information”). Website Navigational Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on the Site (such as the web pages viewed, and the links clicked).

### **Cookies**

Like many companies, we may use cookies on this Site. Cookies are pieces of information shared between your web browser and a website. Use of cookies enables a faster and easier experience for the user. A cookie cannot read data off your computer’s hard drive.

There are different kinds of cookies with different functions:

- (i) Session cookies: these are only stored on your computer during your web session. They are automatically deleted when the browser is closed. They usually store an anonymous session ID allowing you to browse a website without having to log in to each page. They do not collect any information from your computer.
- (ii) Persistent cookies: a persistent cookie is one stored as a file on your computer, and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again.
- (iii) First-party cookies: the function of this type of cookie is to retain your preferences for a website for the entity that owns that website. They are stored and sent between Urban Pantry’s servers and your computer’s hard drive. They are not used for anything other than for personalization as set by you. These cookies may be either Session or Persistent cookies.
- (iv) Third-party cookies: the function of this type of cookie is to retain your interaction with a website for an entity that does not own that website. They are stored and sent between the Third-party’s server and your computer’s hard drive. These cookies are usually Persistent cookies.

We do use third-party cookies on our Sites, as well as third party provided web beacons (please see the section on Web Beacons below). These cookies are used by us and our marketing partners to better understand your preferences and to tailor your experience on the Site to your interests.

More specifically, this Site uses Google Analytics and Adobe SiteCatalyst, which are web analytics services provided by Google, Inc. and Adobe Inc. These services use cookies to help the website analyze how users use the Site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by these vendors on servers in the United States. These vendors will use this information for evaluating your use of the website, compiling reports on website activity, and providing other services relating to website activity and internet usage for Urban Pantry and its affiliates. These vendors may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf. These vendors will not associate your IP address with any other data held by them. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google and Adobe in the manner and for the purposes set out above.

Along with the above noted uses, we use cookies for the following purposes:

### *Where strictly necessary*

These cookies are essential to enable you to move around the Site and use its features, such as accessing secure areas of the Site. Without these cookies, services you have asked for, such as obtaining a quote or logging into your account, cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

### *Performance*

These cookies collect information about how visitors use a Site, for instance which pages visitors go to most often, and if they get error messages from web pages. They also allow us to record and count the number of visitors to the Site, all of which enables us to see how visitors use the Site to improve the way that our Site works. These cookies do not collect information that identifies a person, as all information these cookies collect is anonymous and is used to improve how our Site works.

### *Functionality*

These cookies allow our Site to remember choices you make (such as your language or the region you are in) and provide enhanced features. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customize. They may also be used to provide services you have requested such as viewing a video or commenting on an article. The information these cookies collect is usually anonymized. They do not gather any information about you that could be used for advertising or remember where you have been on the internet.

For information on all these categories of cookies, and for more information generally on cookies please refer to [aboutcookies.org](http://aboutcookies.org). Please consult your web browser's 'Help' documentation or visit [aboutcookies.org](http://aboutcookies.org) for more information about how to turn cookies on and off for your browser.

### *Web Beacons*

The Site may also use web beacons (including web beacons supplied or provided by third parties) alone or in conjunction with cookies to compile information about users' usage of the Site and interaction with emails from Urban Pantry. Web beacons are clear electronic images that can

recognize certain types of information on your computer, such as cookies, when you view a Site tied to the web beacon, and a description of a Site tied to the web beacon. We use web beacons to operate and improve the Sites and email communications. We may use information from web beacons in combination with other data we have about our clients to provide you with information about Urban Pantry and our services. We will conduct this review on an anonymous basis.

### *IP Addresses*

When you visit our Sites, Urban Pantry collects your Internet Protocol (“IP”) addresses to track and aggregate non-Personal Information. For example, Urban Pantry uses IP addresses to monitor the regions from which users navigate the Sites. IP addresses will be stored in such a way so that you cannot be identified from the IP address. In addition, Urban Pantry uses your IP address to get an approximate location, so we can find out delivery options. We do this for both your convenience, as well as for legal compliance reasons.

### *Do-Not-Track*

The major browsers have attempted to implement the draft “Do Not Track” (“DNT”) standard of the World Wide Web Consortium (“W3C”) in their latest releases. As this standard has not been finalized, Urban Pantry’s Site is not compatible with DNT.

## **EMAIL & ACCOUNT REGISTRATION**

During registration on the website, we collect an email address to communicate with you about your transaction. We use this email address to contact you about social events and happenings with Urban Pantry. If you do not want this retained for future promotional email inclusion, we provide you the ability to opt-out.

If a user wishes to subscribe to our emails, we ask for contact information such as name, and email address. We may use your personal information for purposes other than sending you promotional materials. For example, we may use your information to send you administrative communications about any account you may have with us or about future changes to this Privacy Policy. If at any time you should wish to unsubscribe, please click on the “unsubscribe” link in any email from us or send an email to [urbanpantry1@gmail.com](mailto:urbanpantry1@gmail.com)

When you register as a customer of the Urban Pantry website or sign up to receive our email offers, we collect information that helps us identify you. The more information you provide, the better we can customize our services and your experience to suit your needs and preferences.

## **SECURITY OF YOUR PERSONAL INFORMATION**

Whether you are shopping online or in our stores, we use reasonable security measures to protect the confidentiality of personal information under our control and appropriately limit access to it. Urban Pantry cannot ensure or warrant the security of any information you transmit to us by email, and you do so at your own risk.

## **DISCLOSURE OF PERSONAL INFORMATION**

We do not disclose any Personal Information about you to any third parties except as stated in this Privacy Policy, as otherwise permitted by law, or authorized by you.

### *Purchasing*

Third parties to whom we disclose information are required by law and contractual undertakings to keep your Personal Information confidential and secure, and to use and disclose it for purposes that a reasonable person would consider appropriate in the circumstances, in compliance with all applicable legislation, which purposes are as follows:

- To partners who offer products or services via our site, so they can transact with you;
- To notify you or allow our affiliated companies to notify you of certain products or services offered by our affiliated companies;
- For legal, claims settlement and valuation services;
- To process transactions through data processing service providers;
- If the information is a credit card number, to process credit card payments—through third party payment processing, clearing and settlement systems in association with various banks; and
- If these third parties wish to use your Personal Information for any other purpose, they will have a legal obligation to notify you of this and, where required, to obtain your consent. Contact us for more information on these third parties.

## Co-Branded Areas

Some areas in our Site may be offered to you in association with affiliated third parties, such as promotional partners, dedicated producers of drinks, or co-sponsors of events you may want to attend. Such co-branded areas may require you to disclose Personal Information to the third party. The co-branded areas will identify the third party; however, the third party's privacy policy will apply to how they treat your Personal Information. We recommend you review the privacy policy of these third parties. If you elect to register for events or products with these third parties you will be providing your Personal Information to both us, and the third party.

## Service Providers

We use third-party service providers to enhance your shopping experience on our website including, but not limited to, providing shipping services, tax services and product recommendations. These companies may use information (not including your name, address, email address or telephone number) about your visits to this website in order to provide personalized recommendations and advertisements about our goods and services on our website as well as when you visit other websites. Because service providers we use may be in the United States, your Personal Information may be processed and stored inside the United States; and the U.S. government, courts, or law enforcement or regulatory agencies may be able to obtain disclosure of your Personal Information under U.S. laws.

### **Social Media, Reviews, and User Generated Content**

Any personally identifiable information you submit on a social media website, such as Facebook, Instagram, or Twitter, bulletin board, blog, chat room, comment about a product, or any other public forum on this website can be read, collected or used by other users of these forums, and could be used to send you unsolicited messages. We recommend that you do not provide your name, email address or any other personal information in public forums on this Site. Please note that if you choose to do so, it is at your own risk and you accept full responsibility for those posts and any consequences that may arise from posting this information.

## Business Transactions

As we continue to develop our business, we might sell or buy assets. In such transactions, user information, including Personal Information, generally is one of the transferred business assets. Also, if either Urban Pantry itself or substantially all of Urban Pantry assets were acquired, your Personal Information may be one of the transferred assets. Therefore, we may disclose and/or transfer your Personal Information to a third-party purchaser in these circumstances

## Other Legally Required Disclosures

Urban Pantry preserves the right to disclose without your prior permission any Personal Information about you or your use of this Site if Urban Pantry has a good faith belief that such action is necessary to: (a) protect and defend the rights, property or safety of Urban Pantry, employees, other users of this Site, or the public; (b) enforce the terms and conditions that apply to use of this Site; (c) as required by a legally valid request from a competent governmental authority; or (d) respond to claims that any content violates the rights of third-parties. We may also disclose Personal Information as we deem necessary to satisfy any applicable law, regulation, legal process or governmental request.

In this Privacy Policy, the purposes identified above and in "Collection, Use and Disclosure of Personal Information" will be referred to as the "Identified Purposes."

## INFORMATION FROM THIRD PARTIES

Urban Pantry obtains consumer information from third party providers to improve the accuracy of our customer database, increase our understanding of our customers or to identify potential customers.

The third parties with whom we conduct business are authorized to use your information only to perform the service for which they are hired. They are required to abide by the terms of our Privacy Policy including taking reasonable measures to ensure your personal information is secure. We may also share aggregated data with third parties for analysis and research purposes. This data does not contain name, address or other personally identifiable information.

## CHILDREN'S AND MINOR'S PRIVACY

**Urban Pantry's Liquor portion of the website is intended for adults 21 years of age and older.**

We do not knowingly collect personal information from minors under the age of 21. However, if the parent or guardian of a child or minor under 21 believes that the child or minor has provided us with personally identifiable information, the parent or guardian of that child should contact us at [urbanpantry1@gmail.com](mailto:urbanpantry1@gmail.com) if they want this information deleted from our files.

## Updating Your Personal Information

Urban Pantry wants your personal information to be accurate and complete. We provide several different methods for you to update your personal information. To update your name, address, phone number and/or email information:

**Phone:** 312-583-1860

**Email:** [urbanpantry1@gmail.com](mailto:urbanpantry1@gmail.com)

**Mail:**

Urban Pantry  
730 S. Clark Street,  
Chicago, IL 60605  
Attn: Customer Care/Privacy

If you send an email or letter request, please be sure to include your current information and the requested changes.

# Illinois Privacy Notice

Illinois law (SB1502) requires website operators to provide a way for Illinois consumers to opt out of the sale of certain information that the website operator may collect about them. Urban Pantry does not sell your personal information to third parties as defined in Illinois law, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. See above for more information about how you can protect your information, and what we do to protect your information

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If you are using a screen reader and having difficulty with this website or would like to speak with us directly, please call [1-312-583-1860](tel:1-312-583-1860).